

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

----- X

MICROBILT CORPORATION

Plaintiff,

- against -

Civil Action No. 3:19-cv-00637  
Hearing Date: January 19, 2021

BAIL INTEGRITY SOLUTIONS, INC. and  
THOMAS BRIAN SHIRAH in his individual  
capacity; ABC COMPANIES (1-10), JOHN and  
JANE DOES (1-10)

Defendants.

----- X

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Defendant MicroBilt Corporation (“MicroBilt”), through counsel, will move before the Honorable Michael A. Shipp, United States District Judge, on January 19, 2021 for an Order granting MicroBilt’s Motion for Leave to File Documents under Seal. In support of this motion, MicroBilt relies on the attached Motion and Memorandum of Law.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to Fed. R. Civ. P. 78.

*[signatures of counsel appear on the following page]*

Respectfully Submitted,

Dated: December 17th, 2020

**FISHERBROYLES, LLP**

By: s/ Gene M. Burd

Gene M. Burd (NJ Bar. No. 034111997)  
1200 G Street NW  
Suite 800  
Washington, DC 20005  
Telephone: 202.750.0529  
E-mail: [gene.burd@fisherbroyles.com](mailto:gene.burd@fisherbroyles.com)

and

**ARNALL GOLDEN GREGORY LLP**

Jeffrey S. Jacobovitz (DC Bar. No. 346569)  
1775 Pennsylvania Ave. NW, Suite 1000  
Washington, D.C. 20006  
[jeffrey.jacobovitz@agg.com](mailto:jeffrey.jacobovitz@agg.com)  
(202) 677-4056  
Admitted *pro hac vice*

*Attorneys for Plaintiff  
MicroBilt Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

----- X

MICROBILT CORPORATION

Plaintiff,

- against -

Civil Action No. 3:19-cv-00637  
Hearing Date: January 19, 2021

BAIL INTEGRITY SOLUTIONS, INC. and  
THOMAS BRIAN SHIRAH in his individual  
capacity; ABC COMPANIES (1-10), JOHN and  
JANE DOES (1-10)

Defendants.

----- X

**Certificate of Service**

I hereby certify that the foregoing Notice of Motion for MicroBilt's Motion for Leave to File Documents under Seal was filed on the 17th day of December 2020 through the ECF filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

By: s/ Gene M. Burd  
\_\_\_\_\_  
Gene M. Burd